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CITIZENS
communications



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OFFICE OF THE
EXECUTIVE SECRETARY

August 29, 2000

VIA OVERNIGHT DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

RE: Citizens Telecommunications Company of Tennessee and Citizens
Telecommunications Company of the Volunteer State Request for Extension of
Time Pursuant to Section 1220-4-2-.58(5) of the TRA's Rules, Docket No. 00-
00339

Dear Mr. Waddell:

On May 24, 2000, Citizens Telecommunications Company of Tennessee and Citizens Telecommunications Company of the Volunteer State (together, "Citizens") filed a request for an extension of time to May 31, 2001 to file tariffs to offer a blocking service as required by Section 1220-4-2-.58(4) of the TRA's rules. At a conference on July 11, 2000, the TRA granted Citizens an extension of time until September 1, 2000. The Directors indicated at the conference that Citizens should notify the TRA if it appeared doubtful that Citizens could comply with the September 1, 2000 deadline. Because Citizens cannot comply with that deadline, Citizens is providing the requested notice.

In light of the extension of time until September 1, 2000, which is eight months less than Citizens requested, Citizens redoubled its efforts in a good faith attempt to comply as soon as possible. Because Citizens does not own or operate its own billing system and instead contracts with an independent third party for billing services, Citizens must rely on the third party to modify its billing system as necessary to meet Citizens' needs. Given that Citizens is not the only customer for billing services, the significant time and resources that the billing contractor is devoting to complying with the federal Truth-in-Billing requirements for all of its customers, and the ongoing revision of Citizens' bill format, Citizens has had limited success in advancing the date by which its billing system will be compliant with Section 1220-4-2-.58(4). That is not to


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say that Citizens efforts have not yielded fruit. Rather than May 31, 2001, Citizens now expects that its billing system will be compliant by December 31, 2000.

In order to achieve the goals set forth by the TRA in Section 1220-4-2-.58(4), Citizens has developed a manual work-around process for use in the interim. The process is as follows. Citizens will obtain a report showing all end-user customers who are being billed by third-party vendors. Citizens will then contact these customers individually to ensure that each customer is being billed correctly by the third parties. If a customer objects to any of the third-party billing, Citizens will notify the third party to cease billing that customer and will monitor subsequent bills to ensure that the third-party charges do not appear on them. Citizens will repeat this process each month until its billing system is capable of offering an automated third-party billing block.

Please direct any questions or correspondence regarding this matter to Michael Swatts at P. O. Box 770, 300 Bland Street, Bluefield, WV 24701, telephone (304) 325-1216 or to undersigned counsel. Please note the new mailing address and telephone numbers for counsel: Suite 600, 6905 Rockledge Drive, Bethesda, MD 20817, telephone (410) 451-0181, and fax (410) 451-9290.

Sincerely,



John B. Adams
Senior Attorney